

**United States District Court
Western District of Washington
Tacoma Division**

John Doe #1, et al.,

Plaintiffs,

v.

Sam Reed, et al.,

Defendants.

No. 3:09-CV-05456-BHS

The Honorable Benjamin H. Settle

**Plaintiffs' (Agreed) Motion in Limine to
Exclude Evidence**

Noted on Motion Calendar: Sept. 9, 2011

**Plaintiffs' (Agreed) Motion in
Limine**
(No. 3:09-CV-05456-BHS)

BOPP, COLESON & BOSTROM
1 South Sixth Street
Terre Haute, Indiana 47807
(812) 232-2434

Pursuant to C.R. 7(d)(4), Plaintiffs John Doe #1, John Doe #2, and Protect Marriage Washington respectfully request that this Court exclude any evidence offered by State Defendants or Defendant-Intervenors (collectively, "Defendants") and any testimony proffered by witnesses who testify on behalf of Defendants, as it relates to the following: *Testimony or documents purporting to describe or regarding alleged instances of Protect Marriage Washington's noncompliance with any campaign finance reporting requirements.*

On August 19, 2011, attorneys for all Plaintiffs and Defendants met in conference, and counsel for each party agreed that the above-described evidence would not be admissible at trial based on its lack of relevance to any issue presented in this case. *See* Fed. R. Evid. 402.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant this agreed motion in limine and exclude any evidence that falls within the category described above.

Dated this 22nd day of August, 2011.

Respectfully submitted,

/s/ Jared Haynie
 James Bopp, Jr. (Ind. Bar No. 2838-84)*
 jboppjr@aol.com
 Joseph E. La Rue (Ohio Bar No. 80643)*
 jlarue@bopplaw.com
 Jared Haynie (Colo. Bar No. 41751)*
 jhaynie@bopplaw.com
 BOPP, COLESON & BOSTROM
 1 South Sixth Street
 Terre Haute, Indiana 47807-3510
 (812) 232-2434
Counsel for All Plaintiffs
**Pro Hac Vice Application Granted*

Stephen Pidgeon
 ATTORNEY AT LAW, P.S.
 30002 Colby Avenue, Suite 306
 Everett, Washington 98201
 (360) 805-6677
Counsel for All Plaintiffs

Certificate of Service

I, Jared Haynie, am over the age of eighteen years and not a party to the above-captioned action. My business address is 1 South Sixth Street, Terre Haute, Indiana 47807.

On August 22, 2011, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to:

(1) Counsel for Defendants Sam Reed and Brenda Galarza:

Anne E. Egeler — annee1@atg.wa.gov

Jay Geck — jayg@atg.wa.gov

William G. Clark — billc2@atg.wa.gov

(2) Counsel for Intervenor Washington Coalition for Open Government:

Steven J. Dixon — sjd@wkdllaw.com

Duane M. Swinton — dms@wkdllaw.com

Leslie R. Weatherhead — lwlibertas@aol.com

(3) Counsel for Intervenor Washington Families Standing Together

Ryan McBrayer — rmcbrayer@perkinscoie.com

Kevin J. Hamilton — khamilton@perkinscoie.com

William B. Stafford — wstafford@perkinscoie.com

Rhonda L. Barnes — rbarnes@perkinscoie.com

I declare under the penalty of perjury under the laws of the State of Indiana that the above is true and correct.

Executed this 22nd day of August, 2011.

/s/ Jared Haynie

Jared Haynie

Counsel for All Plaintiffs